ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law 100 Lafayette Street, Suite 501 New York, NY 10013

FRANKLIN A. ROTHMAN
JEREMY SCHNEIDER
ROBERT A. SOLOWAY
DAVID STERN

Tel: (212) 571-5500 Fax: (212) 571-5507

December 5, 2017

Via ECF

RACHEL PERILLO

Hon. Lorna G. Schofield United States District Court Southern District of New York 40 Foley Square New York, New York 10007

> Re: United States v. Hassan Muhammad 17 Cr. 610 (LGS)

Dear Judge Schofield:

I represent Hassan Muhammad in the above-referenced matter. I am writing to request a modification of my client's bail conditions to permit him to take his son to medical appointments.

On October 11, 2017, Mr. Muhammad was arraigned on the instant indictment and was released on the following conditions: \$100,000 bond secured by two financially responsible persons; travel restricted to the Southern and Eastern Districts of New York; surrender of travel documents; pretrial supervision; home incarceration; electronic monitoring; the requirement that he continue to seek employment; and that the defendant is to refrain from contact with his co-defendants. He was also permitted to travel to the hospital to visit his newborn son.

Mr. Muhammad has fully complied with all current bail conditions, including visiting his son in the hospital without incident. Mr. Muhammad's son, who is now six weeks old and suffers from a medical condition, gastroschisis, has since been released from the hospital, but requires continued medical

Hon. Lorna G. Schofield December 5, 2017 Page Two

treatment. Accordingly, Mr. Muhammad respectfully requests that the Court modify his current bail conditions to enable him to take his son to medical appointments.

I have spoken with the government, by AUSA Alexandra Rothman, and it has no objection to this request. Additionally, I have spoken with Mr. Muhammad's Pretrial Services Officer, Bernisa Mejia, who has no objection to this request. Mr. Muhammad will provide his Pretrial Services Officer with the necessary information regarding the medical facilities where his son is being treated.

The Court's attention to this matter is greatly appreciated. Please contact my office if your Honor would like any further information regarding this application.

Respectfully submitted,

/s/ Robert A. Soloway

cc: AUSA Alexandra Rothman AUSA Drew Johnson-Skinner AUSA Jordan Estes USPO Bernisa Mejia